

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CC Docket 98-170

In the Matter of Implementation)
of Truth in Billing and)
Billing Format)

To: The Chief, Common Carrier Bureau

Petition for Further Limited Temporary Waiver

Matanuska Telephone Association, Inc. (MTA) hereby requests a further temporary waiver until October 1, 2000 of the requirement under §64.2401(a)(2) of the Rules for "clear and conspicuous" notification in subscriber billing statements of new service providers. In support thereof, the following is shown:

By order released December 27, 1999,¹ the Chief, Common Carrier Bureau, granted blanket waivers of certain of its truth-in-billing requirements, extending from November 12, 1999 to April 1, 2000 the deadline for rural carriers to perform software and computer programming for the following: (1) provider identification, (2) separation by provider, and (3) billing inquiry contact information for third-party charges.

MTA is a local exchange carrier, serving approximately 57,000 access lines in the state of Alaska, and qualifies as a rural telephone company under §51.5 of the Rules. MTA implemented a new billing system in May of 1999. MTA has been in contact with its billing software provider, Aptis, on a number of occasions prior to and since the system was implemented to facilitate the truth-

¹ In the Matter of Truth-in-Billing and Billing Format, Order Granting, In Part, Temporary Waivers, CC Docket No. 98-170, DA 99-3019, released December 27, 1999. ("Waiver Order").

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in-billing requirements. To this point, Aptis has been able to implement all of the requirements for MTA with the exception of one: the requirement in which clear and conspicuous notification of new service providers must be provided on the customer's bill.

On March 9, 2000, MTA received a letter from Aptis (see, Attachment A) advising MTA to file for an extension of the April 1 deadline because Aptis would not be able to deliver a solution to satisfy this last aspect of the FCC's truth-in-billing requirements by the deadline. Despite inquiries from MTA, Aptis has not provided MTA with specific information regarding forthcoming software providing carrier change highlighting, or an estimate of how long it may take Aptis to solve this problem. Accordingly, MTA hereby requests a further extension of time to comply with this one remaining aspect of the Commission's truth-in-billing requirements. A six month extension is requested because MTA is hopeful Aptis will be able to provide the carrier change highlighting feature well within that time frame. MTA will implement this feature as soon as it becomes available from Aptis.

Factors beyond our control have rendered MTA, along with other telephone companies using Aptis as their billing software provider, incapable of compliance with the current April 1, 2000 deadline. MTA has complied with the billing insert information requirement imposed by the Commission in its *Waiver Order* as a condition of the waiver, and its billing system otherwise meets all requirements of the Commission's truth-in-billing rules. Therefore, MTA respectfully requests this limited extension of the deadline.

In granting the waiver extending the compliance deadline to April 1, 2000, the Commission recognized that it would be a better use of small carriers' limited resources for the billing contractors to complete the programming tasks than for each individual carrier to engage in duplication of the programming tasks necessary to achieve compliance with the Commission's truth-in-billing requirements. *Waiver Order*, ¶15. The Commission's rationale applies with equal force to this request for a further extension of the deadline with respect to the new carrier highlighting requirement. MTA will continue to work diligently with Aptis to resolve this situation and will do so as soon as the software becomes available from Aptis.

Respectfully submitted,

MATANUSKA TELEPHONE ASSOCIATION, INC.

A handwritten signature in black ink that reads "Donald J. Reed (PER)". The signature is written in a cursive style and is positioned above the printed name and title.

Donald J. Reed
Regulatory Affairs Manager
Matanuska Telephone Association, Inc.
1740 S. Chugach Street
Palmer, Alaska 99645

March 22, 2000

DC01/328142.2



March 9, 2000

Matanuska Telephone Association, Inc.
Connie Ondola,
Director
1740 Chugach Street
Palmer, AK 99645

To all Aptis Clients

Software development at Aptis is in the process of developing our solution to satisfy the Truth in Billing requirements put out by the FCC. At this time we do not feel that we will be able to deliver that solution to all of our clients in time for the April 1 deadline. Therefore Aptis is strongly urging all of its clients to file for an extension with the FCC by March 15. We will contact you in the near future to go over our interpretation and implementation of the FCC requirements with you. If there are any immediate questions regarding this please feel free to contact me at 518-431-7503.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Kolar".

Robert Kolar
Business Unit Director

San Antonio Office:
7411 John Smith Drive
Suite 200
San Antonio, TX 78229
P 210.949.4700
F 210.949.7100

Albany Office:
8 Southwoods Blvd
Albany, NY 12211
P 518.431.7500
F 518.427.1642

Glendale Office:
116 North Maryland Ave
Lower Level
Glendale, CA 91206
P 818.543.1881
F 818.543.1411